

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	CRIMINAL NUMBER: 18-30009-SMY
)	
CHRISTOPHER RHODES,)	
)	
Defendant.)	

STIPULATION OF FACTS

Comes now Donald S. Boyce, United States Attorney for the Southern District of Illinois through Norman R. Smith, Assistant U.S. Attorney for this District and herewith enter into the following Stipulation of Facts with the defendant, Christopher Rhodes (hereinafter "Defendant") with the advice and consent of Todd Schultz, counsel for the Defendant, as follows:

1. At all relevant times, Christopher Rhodes was an employee at St. Paul's Senior Community, a not-for-profit retirement community in Belleville, Illinois. In his position, Christopher Rhodes had access to patient/resident medical, health and personal identifier information.
2. From at least 2012 and continuing through approximately July of 2017, in St. Clair County, within the Southern District of Illinois, Christopher Rhodes used names, social security numbers and other personal identifier information of patients/residents of St. Paul's Senior Community without authority to obtain and maintain electric and gas service, water service, and satellite television service at his residence.

1. "P.H." was a resident of St. Paul's Senior Community from July 2012 until her death in March 2016. DISH Network satellite television service for the residence of Christopher Rhodes was provided utilizing "P.H.'s" name and credit history from December 2012 through March of 2014.

2. "J.C." was a resident of St. Paul's Senior Community from August 2015 through August 2016. He passed away in February 2017. DISH Network satellite television service for the residence of Christopher Rhodes was provided utilizing "J.C.'s" name and credit history from May 2014 through 2017.

3. "G.H." was a resident of St. Paul's Senior Community from September 2010 until his death in January 2015. Ameren electric and gas utilities for the residence of Christopher Rhodes was provided utilizing "G.H.'s" name and credit history from October 2013 through March of 2014.

4. "J.C." was a resident of St. Paul's Senior Community from August 2015 through August 2016. He passed away in February 2017. Ameren electric and gas utilities for the residence of Christopher Rhodes was provided utilizing "J.C.'s" name and credit history from March 2014 through April 2015.

5. "H.M." was a resident of St. Paul's Senior Community since June of 2014. Ameren electric and gas utilities for the residence of Christopher Rhodes was provided utilizing "H.M.'s" name and credit history from October 2015 through April of 2016.

6. "C.M." was a resident of St. Paul's Senior Community since March of 2016. Ameren electric and gas utilities for the residence of Christopher Rhodes was

provided utilizing “C.M.’s” name and credit history from April of 2016 through October 2016.

7. “E.C.” was a resident of St. Paul’s Senior Community from May 2011 until his death in November 2016. Ameren electric and gas utilities for the residence of Christopher Rhodes was provided utilizing “E.C.’s” name and credit history from October 2016 through March of 2017.

8. “E.M.” was a resident of St. Paul’s Senior Community from June 2012 through July of 2016. He passed away in July of 2017. Ameren electric and gas utilities for the residence of Christopher Rhodes was provided utilizing “E.M.’s” name and credit history from April 2017 through July of 2017.

9. On December 28, 2017, a federal search warrant was executed at the residence of Christopher Rhodes. Located within the residence was personal identifier information of residents of St. Paul’s Senior Community to include names, dates of birth and Social Security numbers. Also located within the residence were utility bills in the names of residents of St. Paul’s Senior Community.

10. On or about April 5, 2014, in St. Clair County, within the Southern District of Illinois, Christopher Rhodes, did knowingly use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in 18 U.S.C. § 1028A(c), to wit, wire fraud as charged in Count 3, knowing that the means of identification belonged to another actual person by utilizing the name of “J.C.” on a DISH Network Service Agreement for the establishment of satellite television at his residence. **[Count1]**

11. Count 2 to be dismissed at sentencing in consideration of pleas of guilty to counts one and three through five.

12. On or about April 5, 2014, in St. Clair County, within the Southern District of Illinois, Christopher Rhodes for purposes of executing, and attempting to execute the above-described scheme and artifice to defraud and deprive, knowingly caused to be transmitted a wire communication in interstate commerce which was foreseeable in the ordinary course of business, the transmission of a DISH Network Service Agreement in the name of "J.C.," a resident of St. Paul's Senior Community, without authority for the establishment of satellite television at his residence.

[Count 3]

13. On or about October 24, 2016, in St. Clair County, within the Southern District of Illinois, Christopher Rhodes for purposes of executing, and attempting to execute the above-described scheme and artifice to defraud and deprive, knowingly caused to be transmitted a wire communication in interstate commerce which was foreseeable in the ordinary course of business, the transmission of a request using the name "E.C.," a resident of St. Paul's Senior Community, to establish Ameren electric and gas utility service at the residence of Christopher Rhodes. **[Count 4]**


14. In or about January, 2016, in St. Clair County, within the Southern District of Illinois, Christopher Rhodes, for purposes of executing, and attempting to execute the above-described scheme and artifice to defraud and deprive, knowingly caused to be transmitted a wire communication in interstate commerce which was foreseeable in the ordinary course of business, the transmission of a credit card

payment to Ameren to continue electric and gas utility service at the residence of Christopher Rhodes using the name "H.M.," a resident of St. Paul's Senior Community. [Count 5]


15. No matters are in dispute.

SO STIPULATED:


CHRISTOPHER RHODES
Defendant
Attorney


TODD SCHULTZ
Attorney for Defendant

DONALD S. BOYCE
United States Attorney


NORMAN R. SMITH
Assistant United States

Date: - 06-07-18

Date: 6/7/2018